

EXHIBIT C

Newman, Hayley B.

From: JAE LEE <jae@lawjsl.com>
Sent: Saturday, September 18, 2021 7:28 PM
To: Newman, Hayley B.
Cc: Celine Frank; McDermott, Linda; NY Tri-State Video Conference
Subject: Re: PARK, MINYE V. DAVID DENNIS KIM, M.D.
Attachments: Plaintiff motion for protective order.pdf

EXHIBIT

DFT C, 9/20/21, G.D.

On Sat, Sep 18, 2021 at 11:46 AM JAE LEE <jae@lawjsl.com> wrote:

Plaintiff rejected the deposition on 9/20/21, starting at 930am in NY (1030pm in S. Korea) thru 5am (S. Korea). You are going to harass Plaintiff by tortuous inhuman treatment over night, which causes intense physical or mental suffering. If Ms. Newman wants to start it at 830pm in NY and continue it thru overnight, you can proceed. Deposition can be easily rescheduled.

Again, Plaintiff rejected the deposition of Plaintiff on 9/20/21, at 930am in NY.

On Sat, Sep 18, 2021, 10:03 AM Newman, Hayley B. <hnewman@hpmb.com> wrote:

Ms. Lee,

Thank you for your response. I will be on the virtual videoconference at 9:30 a.m. on September 20, 2021 with a court reporter and interpreter, ready to proceed with your client's deposition. The deposition was scheduled pursuant to the Notice we served last month, to which you never responded or objected until your email sent after the confirmation booking went out Friday afternoon. The Court ordered you to make your client available for deposition before September 30, 2021 and we are proceeding in accordance with that order.

Thank you,

Hayley Newman

Partner

Heidell, Pittoni, Murphy & Bach

99 Park Avenue

New York, NY 10016

Tel: (212) 286 - 8585

Fax: (212) 490 - 8966

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From: JAE LEE <jae@lawjsl.com>

Sent: Friday, September 17, 2021 8:19 PM

To: Newman, Hayley B. <hnewman@hpmb.com>

Cc: Celine Frank <celine.frank@lexitaslegal.com>; McDermott, Linda <lmcdermott@hpmb.com>; NY Tri-State Video Conference <nyvideoconference@lexitaslegal.com>

Subject: Re: PARK, MINYE V. DAVID DENNIS KIM, M.D.

We do not agree and reject the deposition in 9/20/21 if you do not adjust the time. We had a similar issue a few years ago and the deposition was held at 8pm in NY and 9am in S. Korea. If you want to proceed it in NY time, you must purchase plaintiff's air tickets and hotel and send us.

Future, Plaintiff reserves her rights to claim or sue defendant and/or his counsel for several causes. Also we reserve def's deposition first.

On Fri, Sep 17, 2021, 2:58 PM Newman, Hayley B. <hnewman@hpmb.com> wrote:

Ms. Lee,

We have to conduct the deposition during the Court's business hours in the event that we have an issue that requires a phone call to chambers. The hours you suggest do not align with the Court's hours. She chose to file a lawsuit in the United States and your client was directed by the Court to make herself available for the deposition. I can agree to start at 9:30 a.m., if the reporter and interpreter are available, and we are entitled to take her deposition for 7 hours under the federal rules, as you are well aware.

Thank you,

Hayley Newman

Partner

Heidell, Pittoni, Murphy & Bach

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From: JAE LEE <jae@lawjsl.com>

Sent: Friday, September 17, 2021 2:47 PM

To: Celine Frank <celine.frank@lexitaslegal.com>

Cc: Newman, Hayley B. <hnewman@hpmb.com>; McDermott, Linda <lmcdermott@hpmb.com>; NY Tri-State Video Conference <nyvideoconference@lexitaslegal.com>

Subject: Re: PARK, MINYE V. DAVID DENNIS KIM, M.D.

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Deal All:

We need to change the time from 10am(11pm in S. KOREA) to 8am (9PM in S. KOREA) or 8pm in NY(9AM in S. KOREA). Please note it must be finished before midnight in S. KOREA (11am in NY) if you start 8am in NY. Please confirm.

On Fri, Sep 17, 2021, 2:19 PM Celine Frank <celine.frank@lexitaslegal.com> wrote:

Thank you for scheduling a LegalView remote proceeding with Lexitas. Below are some best practices for a successful remote experience and the link to join.

Please email all exhibits to nytristatehelp@lexitaslegal.com to prevent any delays.

Please note YOU CAN forward this invite to the appropriate person for participation

For all customer service-related inquiries, please email 'NYTRISTATEHELP@LEXITASLEGAL.COM' to prevent any delays.

Topic: PARK, MINYE V. DAVID DENNIS KIM, M.D.

Time: Sep 20, 2021 10:00 AM Eastern Time (US and Canada)

Join Zoom Meeting

<https://lexitas.zoom.us/j/98100182213?pwd=bFc1ZDNFQ1JMeE9qcStJUIRzL01TZZ09>

Meeting ID: 981 0018 2213

Passcode: 410131

One tap mobile

+16468769923,,98100182213# US (New York) 13126266799,,98100182213# US

+(Chicago)

Dial by your location

+1 646 876 9923 US (New York)

+1 312 626 6799 US (Chicago)

+1 301 715 8592 US (Washington DC)

+1 346 248 7799 US (Houston)

+1 669 900 6833 US (San Jose)

+1 253 215 8782 US (Tacoma)

Meeting ID: 981 0018 2213

Find your local number: <https://lexitas.zoom.us/u/aybVLF7j2>

Join by SIP

98100182213@zoomcrc.com

Join by H.323

162.255.37.11 (US West)

162.255.36.11 (US East)

115.114.131.7 (India Mumbai)

115.114.115.7 (India Hyderabad)

213.19.144.110 (Amsterdam Netherlands)

213.244.140.110 (Germany)

103.122.166.55 (Australia Sydney)

103.122.167.55 (Australia Melbourne)

149.137.40.110 (Singapore)

64.211.144.160 (Brazil)

149.137.68.253 (Mexico)

69.174.57.160 (Canada Toronto)

65.39.152.160 (Canada Vancouver)

207.226.132.110 (Japan Tokyo)

149.137.24.110 (Japan Osaka)

Meeting ID: 981 0018 2213

Passcode: 410131

Join by Skype for Business

<https://lexitas.zoom.us/skype/98100182213>

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